



December 7, 2020

VIA ELECTRONIC MAIL

Jackcostantino3@gmail.com

Jack Costantino d/b/a JackCos
213 Walsh Rd
Saratoga, NY 12866

**NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST**

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity*

Mr. Costantino:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the "Greek Freak", is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry. He has established his professional basketball career known as "the Greek Freak", and therefore he is identified by this nickname.

Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark "GREEK FREAK" and "GREEK FR34K" (application approved by the USPTO) both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely mugs, phone cases and post cards, bearing Antetokounmpo's name and likeness, through REDBUBBLE website and

potentially through other outlets. *See Exhibit A.* As a result, we wish to bring to your attention that your actions constitute violations of our client's right of publicity. Moreover, this unauthorized and unlawful use of our client's name and likeness can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights to the above trademarks from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates Mr. Antetokounmpo's name and likeness and other similar variations, as well as of the profits derived from the use of Mr. Antetokounmpo's name and likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's trademarks, name, and likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.



December 7, 2020

VIA ELECTRONIC MAIL

csmall96@gmail.com

Christian Small d/b/a Players on Things
9129 Blue Ridge Drive
Indian Land, SC 29707-2511

**NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST**

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity*

Mr. Small:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the "Greek Freak", is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally recognizable athletes in the sports industry. He has established his professional basketball career known as "the Greek Freak", and therefore he is identified by this nickname.

Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark "GREEK FREAK" and "GREEK FR34K" (application approved by the USPTO) both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely mugs, magnets, stickers, water bottles, shower curtains, duvet covers, pillows, scarves, tote bags, and comforters bearing Antetokounmpo's name and professional jersey number through Redbubble

(<https://www.redbubble.com/>) website and potentially through other outlets. See **Exhibit A**. As a result, we wish to bring to your attention that your actions constitute violation of Antetokounmpo's Right of Publicity. Moreover, this unauthorized and unlawful use of our client's name can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates Antetokounmpo's name, as well as the profits derived from the use of Antetokounmpo's name received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

Additionally, you are required to preserve documents and information relating to the Dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this Litigation Hold has been updated, modified, or released. Failure to preserve documents and information relating to the Dispute may expose you to sanctions and/or legal liability.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.



December 9, 2020

VIA ELECTRONIC MAIL

sherriemr3565@yahoo.com

Sherrie Richardson-Miller aka Sherriemr3565 d/b/a
ThingsToMakeYaSmile
766 Birmingham Road
Westerville, OH 43081-3460

**NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST**

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity*

Mrs. Miller:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

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Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark "GREEK FREAK" and "GREEK FR34K" (application approved by the USPTO) both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely canvas bearing Antetokounmpo's name and likeness, through Etsy (<https://www.etsy.com/>) website and potentially through other outlets. See **Exhibit A**. As a result, we wish to bring to your attention

that your actions constitute violation of Antetokounmpo's Right of Publicity this unauthorized and unlawful use of our client's likeness and name can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREEK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates Antetokounmpo's likeness, as well as the profits derived from the use of Antetokounmpo's likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

Additionally, you are required to preserve documents and information relating to the Dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this Litigation Hold has been updated, modified, or released. Failure to preserve documents and information relating to the Dispute may expose you to sanctions and/or legal liability.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.



December 15, 2020

VIA ELECTRONIC MAIL

info@allstarhigh.com
uatwstore@gmail.com
info@JordansSecretStuff.com
jordanssecretstuff@gmail.com

Jordan Reyes d/b/a All-Star High d/b/a Us Against The
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Los Angeles, CA 90029-3615

**NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST**

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity*

Mr. Reyes:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry. He has established his professional basketball career known as "the Greek Freak", and therefore he is identified by this nickname.

Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark "GREEK FREAK" and "GREEK FR34K" (application approved by the USPTO) both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely jerseys bearing Antetokounmpo's name, through <https://www.etsy.com> ETSY; <https://www.allstarhigh.com> All-Star High, <https://www.usagainstheworld.store> Us Against the World; <https://www.jordanssecretstuff.com>

JordansSecretStuff and potentially through other outlets. See **Exhibit A**. As a result, we wish to bring to your attention that your actions constitute a violation of our client's right of publicity. Moreover, this unauthorized and unlawful use of our client's name can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates our client's name and likeness, as well as the profits derived from the use of my client's name and likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's name, likeness, and trademarks and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Additionally, you are required to preserve documents and information relating to the Dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this Litigation Hold has been updated, modified, or released. Failure to preserve documents and information relating to the Dispute may expose you to sanctions and/or legal liability.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.

EXHIBIT A



August 6, 2020

VIA ELECTRONIC AND REGULAR MAIL

jacksonsparks@gmail.com

Jackson Sparks d/b/a jesparks
6997 S 1450 W
Sandborn, IN 47578

**NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST**

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Infringement of the "Greek Freak" Mark.*

Mr. Sparks:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for trademark infringement pursuant to 15 U.S.C. § 1114(1)(a); false designation of origin and trademark dilution pursuant to 15 U.S.C. § 1125(a)(1)(A); common law claims for unjust enrichment; trademark infringement and unfair competition in violation of New York common law; and trademark dilution pursuant to 15 U.S.C. § 1125(c); and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the "Greek Freak", is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry. He has established his professional basketball career known as "the Greek Freak", and therefore he is identified by this nickname.

Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark "GREEK FREAK" and "GREEK FR34K" both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely t-shirts, long sleeve shirts, phone cases, clocks, mugs, tote bags, pillows, notebooks, scarves, laptop skins, hoodies, greeting

cards, stickers, art prints, zipper pouches, drawstring bags, postcards, tank tops, laptop sleeves, and baseball shirts bearing Antetokounmpo's trademark, through the website, Redbubble (<https://www.redbubble.com/>) and potentially through other outlets. See **Exhibit A** for screenshots showing the infringing items, and **Exhibit B** for a list of the URLs of the infringing products.

As a result, we wish to bring to your attention that your actions constitute infringement of our client's trademarks. Moreover, this unauthorized and unlawful use of our client's marks can result in a likelihood of significant consumer confusion as to the source and affiliation of the products, and dilution of the value of our client's trademarks. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights to the above trademarks from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates the "GREEK FREAK" and other similar variations, as well as of the profits derived from the use of "GREEK FREAK" mark received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's trademarks and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

Additionally, you are required to preserve documents and information relating to the Dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice

that this Litigation Hold has been updated, modified, or released. Failure to preserve documents and information relating to the Dispute may expose you to sanctions and/or legal liability.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.



August 24, 2020

VIA REGULAR MAIL & EMAIL

luhmdesignmerch@gmail.com

Matthew Luhm d/b/a Luhm Design
W176S7045 Hiawatha Drive
Muskego, WI 53150-9427

**NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST**

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of* Giannis Antetokounmpo's Right of Publicity

Mr. Luhm:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for infringement pursuant to 15 U.S.C. § 1114(1)(a); false designation of origin and trademark dilution pursuant to 15 U.S.C. § 1125(a)(1)(A); common law claims for unjust enrichment; trademark infringement and unfair competition in violation of New York common law; and trademark dilution pursuant to 15 U.S.C. § 1125(c); and deceptive acts and practices pursuant to New York General Law Section 349.

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Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark "GREEK FREAK" and "GREEK FR34K" (application approved by the USPTO) both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely t-shirts, long sleeve shirts, duvet covers, phone cases, clocks, mugs, tote bags, pillows, sweatshirts, posters, ipad cases, notebooks, shower curtains, blankets, coasters, water bottles, hoodies, greeting cards, stickers, drawstring bags, postcards, tank tops, and baseball shirts bearing Antetokounmpo's name and likeness, through Redbubble (<https://www.redbubble.com/>) website and potentially through other outlets. See **Exhibit A**. As a result, we wish to bring to your attention that your actions constitute infringement. Moreover, this unauthorized and unlawful use of our client's likeness can result in a likelihood of significant consumer confusion as to the source and affiliation of the products, and dilution of the value of our client's trademarks. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights to the above trademarks from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates the "GREEK FREAK" and other similar variations, as well as of the profits derived from the use of "GREEK FREAK" mark received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's trademarks and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

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If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.



January 11, 2021

VIA ELECTRONIC MAIL

Ryan@BiddleArt.com

Ryan Biddle d/b/a RyanBiddle
10342 Greimel Road
Baraboo, WI 53913

**NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST**

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity*

Mr. Biddle:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

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Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely prints bearing Antetokounmpo's name and likeness, through ETSY, <https://www.etsy.com> website and potentially through other outlets. See **Exhibit A**. As a result, we wish to bring to your attention that your actions constitute violation of Mr. Antetokounmpo's Right of Publicity. Moreover, this unauthorized and unlawful use of our client's name and likeness can result in a likelihood of

significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

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We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates the "GREEK FREAK" mark and Mr. Antetokounmpo's name and likeness and other similar variations, as well as of the profits derived from the use of the "GREEK FREAK" mark and Mr. Antetokounmpo's name and likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's trademarks, name and likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Additionally, you are required to preserve documents and information relating to the Dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this Litigation Hold has been updated, modified, or released. Failure to preserve documents and information relating to the Dispute may expose you to sanctions and/or legal liability.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.



PARDALIS & NOHAVICKA, LLP
ATTORNEYS

February 19, 2021

VIA ELECTRONIC MAIL

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wlaikiesha@address.com
lakieshawms@comcast.net
designzbykey@gmail.com

Laikiesha Williams d/b/a DesignzbyKey
3040 Finsel Court
Olney, MD 20832-3023

**NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST**

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity*

Ms. Williams:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the "Greek Freak", is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry.

Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely drug paraphernalia bearing Antetokounmpo's name and likeness, through Etsy (<https://etsy.com>) and potentially through other outlets. See **Exhibit A**. As a result, we wish to bring to your attention that your actions constitute a violation of Antetokounmpo's Right of Publicity. Moreover, this unauthorized and unlawful use of our client's likeness can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous

personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates Antetokounmpo's likeness, as well as the profits derived from the use of Antetokounmpo's likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

Additionally, you are required to preserve documents and information relating to the Dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this Litigation Hold has been updated, modified, or released. Failure to preserve documents and information relating to the Dispute may expose you to sanctions and/or legal liability.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.



December 3, 2020

VIA ELECTRONIC MAIL

info@topshelfprints.com

sportsimages@coastalprinting.ca

info@coastalprinting.ca

Tyler Buckle d/b/a Topshelf Prints and James Faye
Buckle d/b/a Coastal Printing
58 Rue Monseigneur SchefferBrador,
QC G0G 1E0, Canada

**NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST**

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity*

Mr. Tyler Buckle and Mr. James Buckle:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the "Greek Freak", is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry. He has established his professional basketball career known as "the Greek Freak", and therefore he is identified by this nickname.

Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark "GREEK FREAK" and "GREEK FR34K" (application approved by the USPTO) both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely posters bearing Antetokounmpo's likeness, through Etsy (<https://www.etsy.com/>) website and potentially through other outlets. See **Exhibit A**. As a result, we wish to bring to your attention that your actions constitute violation of Antetokounmpo's Right of Publicity. Moreover, this unauthorized and unlawful use of our client's likeness and marks can result in a likelihood of significant consumer confusion as to the source and affiliation of the products, and dilution of the value of our client's trademarks. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates Antetokounmpo's likeness, as well as the profits derived from the use of Antetokounmpo's likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

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If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.